

**FOLKMAN LLC**

THEODORE J. FOLKMAN  
TED@FOLKMAN.LAW  
+1 (617) 219-9664

BY CM/ECF

November 19, 2021

Hon. Louis L. Stanton  
U.S. District Court for the Southern District of New York  
500 Pearl St.  
New York, NY 10007-1312

re: *Pivar v. The Van Gogh Museum, No. 1:21-cv-09362-LLS*

Dear Judge Stanton:

I represent the defendant, the Van Gogh Museum Foundation, named in the complaint as the Van Gogh Museum, in this action. My motion for admission *pro hac vice* was filed on November 17 and is pending.

The defendant respectfully requests an extension of time to January 2, 2022 to answer or otherwise respond to the complaint. When the case was pending in the New York Supreme Court, I agreed to accept service of process by email in return for the plaintiff's agreement to allow sixty days from the date of service for filing an answer or other response to the complaint.

The plaintiff effected service of process per the agreement between counsel on November 2, 2021, and an answer or other response is presently due on November 23, 2021. This is the defendant's first request for an extension of time. Counsel for the plaintiff has assented to this extension of time.

Respectfully submitted,



Theodore J. Folkman

cc: Mitchell Cantor, Esq. (by email and mail)  
Ralph M. Stone, Esq. (by ECF)